

REMARKS

Claims 17-26 were examined in the Office Action mailed May 12, 2010. These claims stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,101,456 to Kowatari, *et al.* (“Kowatari”) in view of U.S. Patent No. 6,671,641 to Collins, *et al.* (“Collins”).

The Applicants have amended claims 17 and 21 to incorporate the limitations of claims 25 and 26, respectively. Conforming amendments cancelling claims 25 and 26 have also been made.

1, The Claims Are Patentable Over Kowatari and Collins. The Applicants respectfully traverse the pending § 103(a) rejection on the ground that the Collins reference does not teach or suggest all of the features recited in the pending claims for which it is cited.

The Collins reference is cited as disclosing “calculating as learned values a first difference between the minimum-side displacement control pressure and the first measured pressure, and a second difference between the maximum-side displacement control pressure and the second measured pressure.” May 12, 2010 Office Action at 7 (citing to Collins at 4:58-61 and identifying the “ $+\text{-}0.1$ ” as the learned value).

The cited portion of Collins, and in particular the portion discussing “ $+\text{-}0.1$ ” range, does not refer to calculating either a first or second *difference between a control pressure and a measured pressure*, but instead in step 62 only determines whether the actual pressure is *within a tolerance range of a predetermined target pressure* (the “ $+\text{-}0.1$ ” range, *e.g.*, if the predetermined

target pressure is 93.0 psi, in step 62 the program checks to see whether the actual pressure is between 92.9 and 93.1 psi). Collins at 4:58-61. This is not an assessment of a pressure difference, nor the recited learned pressure value (*i.e.*, learned pressure difference values at two different points, the minimum and maximum pressure regions).

Rather, Collins only teaches calibrating a single entity: correlating pressure output to the module assembly electrical current – indeed, this section of Collins is labeled “the module assembly calibration logic.” Collins at 4: 42-5:6 (“Referring now to FIG. 4, the module assembly calibration logic is shown, …”). Thus, while the learned value in Collins is associated with obtaining the Table 3 table relating a desired pressure value to electrical current values, this current value table does not teach or suggest the presently claimed difference relative to a reference characteristic; Collins teaches determining a calibrated value itself.

Collins’s pressure/current calibration steps also do not teach or suggest the claimed “generating a correction characteristic representing a relationship between a correction pressure and a displacement command, *based on the first difference and the second difference and the minimum-side displacement corresponding to the first measured pressure and the maximum-side displacement corresponding to the second measured pressure.*” (The foregoing applies to all of independent claims 17, 18, 21 and 22.)

In view of the foregoing, the Applicants submit that the combination of Kowatari and Collins would not have resulted in the invention recited in the currently pending claims, and therefore the claims are patentable over these

references under § 103(a). Reconsideration and withdrawal of the pending § 103(a) rejections is respectfully requested.

CONCLUSION

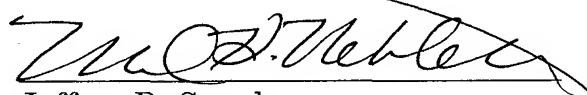
In view of the foregoing amendments and remarks, the Applicants submit that claims 17-24 are in condition for allowance. Early and favorable consideration and issuance of a Notice of Allowance for these claims is respectfully requested.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket # 101790.58258US).

Respectfully submitted,

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